



Community Services Department

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**Marion County Extension &
4-H Service District**

November 13, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

**RE: Marion County - Application for USEPA Brownfield Community-Wide
Assessment Grant**

Dear Administrator Pruitt:

Marion County (County) is applying for a \$300,000 USEPA Brownfield Community-Wide Assessment (CWA) Grant. The grant funds will support the efforts of County and local public and private partners to expand upon the 2016 land inventory that served as a preliminary brownfield inventory for the North Santiam region.

The County has been working over a series of years with its partners to promote redevelopment of vacant and underutilized properties in the targeted North Santiam area identified in our attached narrative and to promote equitable economic development in this distressed rural area. The goals of this CWA is to provide the necessary identification, assessment, education, and mitigation plans to reduce the barriers for redevelopment of this area when a market response has not provided a solution.

All of the four initial priority brownfield sites are within mere feet of the North Santiam River which puts the County's most vulnerable residents closest to potential soil, air, and groundwater contamination, with few resources to further invest in the site readiness for economic activity. The target area residents, County, and its partners are enthusiastic about the potential of brownfield redevelopment and what it could mean for their community.

a. Applicant Identification

Marion County
555 Court St NE, Suite 5232
Salem, Oregon 97309

b. Funding Requested

- i) Grant Type: Assessment
- ii) Assessment Grant Type: Community-wide
- iii) Federal Funds Requested: \$300,000



**Community
Services
Department**

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: Marion County

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Protect/Enhance Water

Threatened and Endangered Species

Page Number(s): 1,2,3,4,5,8,9,12,13

Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	2
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	2
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	10
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



Oregon

Kate Brown, Governor

Department of Environmental Quality

Western Region Eugene Office

165 East 7th Avenue, Suite 100

Eugene, OR 97401

(541) 686-7838

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TTY 711

November 13, 2017

Susan Morales

U.S. Environmental Protection Agency, Region 10

1200 Sixth Avenue, Suite 900 (ECL-112) Seattle, WA 98101-3140

RE: Marion County's Application for a Community-Wide Assessment Grant

Dear Ms. Morales:

DEQ supports Marion County's application for a \$300,000 EPA assessment grant, representing the North Santiam Canyon Communities - Lyons, Mill City, Gates, Detroit, and Idanha. The grant would be equally divided between hazardous substances and petroleum funding. Over the past several years, Marion County has worked with state and local partners to evaluate the need for economic development, infrastructure improvements, and redevelopment of underused properties in these small communities with very limited resources. In addition, location of the communities in rugged geography along the North Santiam River limits the land available for housing, commercial sites, industrial sites, water treatment, and wastewater treatment plants – all of which are critical needs in this area. Assessing, and cleaning up brownfields is therefore crucial for making land available to improve the livability of North Santiam Canyon Communities.

Marion County has done the leg work to develop a strong network with business owners, municipal partners, and community members in the North Santiam Canyon to address the economic stagnation. They also have created an inventory of brownfields along the North Santiam Canyon corridor by partnering with the Mid-Willamette Council of Governments (COG) and Oregon Business Development Department (Business Oregon). The inventory identified brownfields site in the following locations: a former gas station in Mill City, a former junk yard in Gates, a former restaurant with septic issues in Detroit, and 12-acre former mill site in Idanha. Also, these communities have worked with DEQ in developing wastewater infrastructure alternatives. Marion County and these communities are poised to take advantage of the grant funding if awarded.

DEQ supports Marion County application for a community-wide assessment grant, and encourages EPA to fund this grant and thereby provide Marion County the much needed resources to address brownfields in the North Santiam Canyon area.

Sincerely,

Dave Belyea

Western Region Administrator

Oregon Department of Environmental Quality

ec Danielle Gonzalez , Marion County
Mary Camarata, WR BF Coordinator
Gil Wistar, HQ BF Coordinator
Seth Otto, Maul Foster & Alongi, INC.

1. COMMUNITY NEED

a. Targeted Area and Brownfields

i. Community and Target Area Description: Marion County, in northwest Oregon, includes the city of Salem, the Oregon state capital. The North Santiam Canyon (target area) extends along the middle of the southern edge of the county, the border of which is formed by the North Santiam River. The target area includes several small communities (Lyons, Mill City, Gates, Detroit, and Idanha) strung along State Highway 22. The census place designations of these communities make up the target area population. The target area is home to 3,736 people. This target area has been elevated to a top priority for Marion County and the State of Oregon for multiple reasons, but especially because it is critical to community health in Oregon's Central Willamette Valley. As the North Santiam River provides drinking water for over a quarter million people, it is increasingly alarming that most of the population in the target area, living in very close proximity to the river, relies entirely on individual septic systems to handle wastewater. In addition, multiple brownfield properties limit redevelopment and contribute to a strong sense of blight and lack of opportunity in the target area. Marion County (the County) and the state have begun investing heavily in the target area to help address the underlying conditions that, while they pose a significant threat to regional health, currently have only local and limited solutions to that threat.

The North Santiam Canyon has a long history of providing passage between the Willamette Valley and Central Oregon. It was a trade route for indigenous peoples for millennia, and in recent history, it was the route of the Minto Trail in 1878 and then of the Oregon and Pacific Railroad in the 1880s. During its operation, the railroad extended from the eastern edge of the target area westward to the Oregon coast. Each of the towns in the target area was home to a mill or other timber-industry-related facility (e.g., lumber cutting, veneer) in operation since as early as 1857. Historically, employment in the region has depended largely on logging, mills, and wood products. According to an economic study of the area, the region's economy lacks diversification." Much of the competitive economic advantage that the target area previously enjoyed was the result of close proximity of federal timberlands in the Willamette National Forest. Access to this raw material base declined with reduced federal harvest levels. Since this decline, mills closed, causing a sharp decline in employment levels. According to the Oregon Employment Department, as recently as 1999 63.4% of all employment in the target area was in logging, mills, and wood products, compared to 4% in the county as a whole.

As a result, the target area struggles with unemployment, poverty, crime, and environmental contamination. Despite these challenges, the community has continued to invest in community-based redevelopment efforts in the target area. The redevelopment of local brownfields and establishment of an industrial land base have been identified as priorities by multiple agencies, as described in Section 2.a.i. The County has been building partnerships and leveraging other resources to assess the capacity of the community to grow and to build on brownfield redevelopment priorities to do so. For example, the County and the Mid-Willamette Council of Governments (COG) partnered to obtain funding from the Oregon Business Development Department (Business Oregon) in order to develop a regional land inventory for the target area that would assess local redevelopment potential of commercial and industrial sites. This land inventory identified the redevelopment of brownfields as a crucial step in creating new opportunities in the target area. Of the commercial and industrial parcels inventoried in the target area, 57% were suspected or known brownfields, indicating that the ability of the target area to expand its capacity to support additional development could be significantly improved through brownfield assessment and cleanup planning. The land inventory effort included stakeholders and community members from each town in the target area, building excitement and momentum around the idea of brownfield redevelopment and the potential it would create for a brighter future for the target area. In November of 2016, the Marion County Board of Commissioners, Marion County Economic Development Advisory Board and more than 35 additional community and city leaders were in attendance in three separate meetings for initial discussions

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on the land inventory, water quality, public health and the desperate need for a region-wide wastewater solution to mitigate some concerns. The land inventory provided the County with a preliminary inventory of the known or suspected brownfield sites in the immediate target area based on state-wide database information.

The County would use Community-Wide Assessment (CWA) grant funding to expand this preliminary inventory and conduct Phase I and Phase II environmental site assessments (ESAs) on community-selected sites in the target area and cleanup and reuse planning on three priority sites. More than 57% of existing commercial and industrial parcels in the target area are known or suspected brownfields. The communities are further confined by the surrounding public lands leaving few other avenues the County can pursue to increase development and the number of jobs in the target area. The COG, in their 2014 *North Santiam Canyon Economic Opportunity Study*, listed “[taking] measures to insure that existing vacant and industrial and commercial sites with environmental problem areas are cleaned up and ready for new uses” as one of the top economic development objectives for the region. These 611 acres may be polluted with petroleum and hazardous waste products from the bygone era of intense timber processing, discouraging revitalization because of blight and risk to developers. CWA funding would propel current revitalization efforts forward and give the County the resources it needs to expand its developable land base, returning desperately needed, living-wage jobs to the target area.

ii. Demographic Information and Indicators of Need:

Table 1: Community and Income Demographics				
	Targeted Population¹	Marion County²	State of Oregon²	United States²
Population	3,736	323,259	3,939,233	316,127,513
Unemployment	14.1%	10.7%	9.3%	8.3%
Poverty Rate	17.0%	18.4%	16.5%	15.5%
Percent Minority	10.2%	33.0%	22.7%	37.8%
Median Household Income	\$41,511	\$48,432	\$51,243	\$53,889
Less than a High School Education	16.0%	15.7%	10.2%	13.4%
Percent Elderly (over 65 years)	18.5%	14.0%	15.4%	14.1%
¹ Data for the target population are based on the combined data for census place designations for Lyons, Mill City, Gates, Detroit, and Idanha.				
² Data are from the 2011-2015 American Community Survey 5-Year Estimates available on American FactFinder at https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml .				

The need for assistance in the target area is greater than in the surrounding county and state. The unemployment rate in the target area is higher than in the county, state, and nation. What is more, the target area was hit harder by the decline of the timber industry and the Great Recession. While the target area and the state both saw increasing unemployment between 2000 and 2015, the unemployment rate in the target area doubled, whereas that of the state increased 43%. The poverty rate in the target area is comparable to Marion County's, but higher than those of the state and the nation. Once again, looking deeper in the data, the target area is feeling this impact more dramatically. Even though there isn't a drastic difference in the poverty rates, those who are employed in the target area are making significantly less in terms of median household income. This poverty has affected families in the target area. In the Santiam Canyon School District, 54% of the students receive free or reduced-price meals.¹ There is also a higher concentration of elderly people in the target area who are more vulnerable to contamination. In addition to the toll the brownfields take on the target area community, there are literal downstream effects on all sensitive populations in the county who rely on the adjacent North Santiam River as their primary source of drinking water.

¹ Oregon Department of Education. (2017). *Students Eligible for Free/Reduced Lunch 2016-2017* [Data file]. Retrieved from <http://www.ode.state.or.us/sfda/reports/r0061Select2.asp>

iii. **Brownfields and Their Impacts:** The target area is situated on the North Santiam River, where there is a rich industrial history of timber harvesting and processing. However, this history translates today into significant redevelopment challenges. Of the parcels currently zoned for commercial or industrial development, 57% are known or suspected to be contaminated with potential petroleum or hazardous substances.² The following are the sites of greatest concern because of their significant potential for and/or documented impacts to the environment and health of the target area:

- **Santiam Quick Mart:** a 0.4-acre former gas station. A gas station was built here in 1954 and has continued in operation under various owners since. The status of the storage tanks is uncertain and the property is likely to have petroleum contamination as well as, potentially, metals in the soil and groundwater. It is located only 450 feet from the North Santiam River. 654 NW Santiam Blvd, Mill City, OR 97360
- **Gates Commercial Property:** a potential former junk yard in a prominent commercial location along Highway 22. This mostly vacant and underutilized 1.37-acre property was identified in the preliminary brownfield inventory as a suspect brownfield. Suspected contamination includes petroleum, heavy metals, solvents, and PCBs.
- **Local Restaurant:** Located in Detroit on the main street in a heavily touristed area. There are concerns about environmental contamination on the property, and the septic system regularly backs up into the building. The lot size is too small for additional remedies such as septic replacement. This property is in a high-profile location and would be suitable for redevelopment if environmental and wastewater issues could be resolved.
- **Idanha Mill:** a 12.43-acre property that was the previous location of a mill. Abandoned buildings and related industrial remnants on the property contribute to a sense of blight and neglect. The property is located on Highway 22 and in close proximity to the small community of Idanha. It also represents one of the few industrially zoned properties in the eastern end of the North Santiam Corridor. Suspected contamination includes petroleum, heavy metals, solvents, and PAHs.

The four prominent brownfields described above are located in close proximity to surrounding residential properties and the North Santiam River. The exact character and extent of contamination on sites throughout the target area are unknown, even though the North Santiam River is the primary source of drinking water for the county, a population of more than a quarter million people. Contamination from these sites may be in the soil and groundwater. PCB, PAH and other similar contaminants suspected at the target brownfield sites are carcinogenic to humans and fish, and other wildlife are extremely sensitive to these forms of contamination. Additionally, contamination from fuel creates the potential for vapor intrusion, putting residents living nearby at risk for exposure to toxic vapors. The fact that 57% of commercial and industrial parcels in the target area are known or suspected brownfields has created a region-wide perception of contamination that deters property acquisition, investment, and redevelopment.

The preliminary inventory identified 11 additional sites that are suspected brownfield sites. Some of these sites have known or suspected petroleum tanks or hazardous-materials releases, and others have a history that suggests that some level of this contamination may continue to pose risks to human and environmental health. These sites may only be perceived as brownfields and could, through ESA, be made shovel-ready. These sites are all within a mile of target-area residents. The full extent of public health impacts from known and suspected brownfields is discussed in Section 1.b.iii.

b. Welfare, Environmental, and Public Health Impacts

i. **Welfare Impacts:** The target area is disadvantaged by a higher proportion of welfare impacts, including blight, lack of access to community and transportation services, and proximity to a

² Maul Foster & Alongi, Inc. (2017). *North Santiam Canyon Regional Land Inventory*. Salem, OR: Marion County.

highway that presents serious safety concerns, than the rest of Marion County. The preliminary brownfield inventory revealed that all of the known or suspected brownfields are either underutilized or vacant properties, some with old buildings in disrepair contributing to blight in the target area. This blight is exacerbated by a lack of community services. A high amount of vacant and/or blighted space means the opportunity for more crime or illegal drug use. The drug-induced mortality rate in Marion County has increased 57% in the past two years.³ The nearest hospital (as well as the nearest food bank or services for the homeless) is as far as 40 miles from residents in the eastern part of the target area. Public transportation travels only halfway into the target area and makes only two full round trips daily between 8 a.m. and 5 p.m.

ii. Cumulative Environmental Issues: In addition to the brownfields' harmful effects on the environment, the target area is experiencing a number of cumulative environmental issues:

- *Environmental Justice:* All of the priority brownfield sites listed in Section 1.a.iii are in the rural target area and, specifically, within a quarter mile or less of residential areas. This means that the most sensitive populations are the most impacted by the negative effects of unassessed brownfields: dilapidation, low employment, long commutes, and poor public health. The decline of the timber industry left a hole in the workforce that, due to the deterrent to development created by the brownfields covering 57% of existing commercial and industrial parcels, has not provided a positive market response for redevelopment.
- *Urban Sprawl:* Since 2000, the population of Marion County has increased by 13% and is now at approximately 323,000 residents. However, the target community experienced only 6% growth. Growth in the target area is limited by lack of services, infrastructure, and employment opportunities. Housing cost pressures in Marion County's urban areas are pushing lower income individuals and families further out into these already distressed communities.
- *Commuting:* Currently, 87% of the target area commutes to work, mostly west to the cities of Stayton and Salem. A large percentage of these commuters (34%) are traveling 25 to 50 miles one-way and another 21.5% are commuting more than 50 miles each way.⁴ The large commute distances contribute to air pollution (Marion County has the third-highest number of hospitalizations from asthma of all Oregon counties),⁵ road congestion, the amount of time the target community spends in sedentary activity, the community's financial burden of paying to drive alone, and stress levels.
- *Wastewater Management:* Decades ago, the State of Oregon implemented well-intended statutory restrictions on rural upstream communities near three primary watersheds that feed urban downstream users. These restrictions reduce options to utilize generally accepted wastewater management approaches and practices in the target area, thereby limiting the long term financial sustainability of a large scale wastewater solution. This administrative rule is known as the Three Basin Rule. The estimated unsubsidized cost of a wastewater solution for this region is more than 400% above the median household affordability rate for the income strata of these communities. In other words, the exorbitant cost of well-intentioned protection measures are now inhibiting the long term protection of the water source, the North Santiam River.
- *North Santiam River and Watershed Impacts:* Before federal and state water regulations, there were over 115 years of nearly unrestricted discharge of pollutants into the North Santiam River from extensive industrial timber-related uses located along the riverfront. These included logging, mills, and wood-products manufacturers. These industrial uses marked the target area as a major source of raw materials, but they also impacted the

³ Marion County Public Health Department. (2017). *Community Health Assessment*. Salem, OR.

⁴ U.S. Bureau of the Census. 2016. OnTheMap Application. Longitudinal-Employer Household Dynamics Program. <http://onthemap.ces.census.gov/> on 10/19/15.

⁵ Oregon Health Authority. (n.d.). *Oregon Environmental Public Health Tracking*. Retrieved October 19, 2017, from <http://epht.oregon.gov/Index.aspx>

surrounding waterways and wetlands. Various threatened and endangered species, including Chinook salmon, coastal cutthroat trout, winter steelhead, and northern spotted owl, are present, migrate through, and/or breed in these areas, according to the Oregon Department of Fish and Wildlife's Priority Habitat and Species list. Environmental assessments conducted in the large North Santiam River drainage basin will provide an understanding of the potential impacts of contamination on these habitats and species, and how to most effectively promote the U.S. Environmental Protection Agency's (USEPA) Region 10 goal of protecting and enhancing the water to reduce threats to the environment. Additionally, the North Santiam River is the primary source of drinking water for a majority of the 323,259 people living in Marion County.

iii. Cumulative Public Health Impacts: The full extent and character of the contamination of the four priority brownfields and the 11 other sites suspected of contamination, as discussed in Section 1.a.iii, are not fully understood. However, what is known about their past uses indicates likely contamination of the soil, air, groundwater, and the North Santiam River and its tributaries. Known brownfields less than a quarter mile from residential areas and less than one-half mile from the North Santiam River, which supports areas where endangered species live and spawn and provides the drinking water for a majority of Marion County residents, are contaminated with carcinogenic waste and petroleum. Various segments of the North Santiam River have been listed on DEQ's 303(d) list as category five (the highest), which means that DEQ has data indicating that the water quality standards have been violated for one or more pollutants and there is no pollution control plan.⁶ Oregon's Environmental Public Health Tracking shows that Marion County had high cancer rates compared to the other 35 counties in Oregon and was the third highest in 2010. The 2017 Marion County Community Health Assessment identified cancer as the leading cause of death in the county.⁷

Lastly, while a 10-mile commute is all it takes to see a rise in blood sugar, cholesterol, risk of depression, and anxiety, target area residents are regularly commuting up to 100 miles round-trip.⁸ This may be why the percent of adults considered obese is 27% higher in Marion County than in Oregon overall. This long commute also exacerbates the air pollution in the community and forces residents to spend more time in the car. Assessing and creating cleanup plans for the priority brownfields will help bring employment back to the community and potentially reduce the time the target area community commits to traveling to work. Additionally, determining what pollutants are reaching the North Santiam River through various media can help the County ensure safer drinking and recreational waters for all its residents and visitors.

c. Financial Need

i. Economic Conditions: The decline of the timber industry and the restriction of logging to protect the spotted owl in Marion County deeply impacted the local economy and required an adjustment to the County's funding strategies. Hundreds of direct and indirect jobs were lost as the result of mill closures within the target area and the region has yet to fully recover three decades later. The Great Recession that began in 2008 has added to the challenges facing the region. The Marion County FY2011-2012 Budget Officer's Message described the problem: "The falling housing values and the increased foreclosure rate have led to a 20% decrease in the residential housing values in the past two years." Without a sales tax, counties in Oregon rely heavily on property taxes. Steep declines in the budget (decreases in state timber revenue is cited as one of the major sources of this decline) forced the County to institute a hiring freeze, cut

⁶ Oregon State Department of Environmental Quality. (2010). *Oregon's 2010 Integrated Report Assessment Database and 303(d) List* [Data file]. Retrieved from <http://www.deq.state.or.us/wq/assessment/rpt2010/search.asp#about>

⁷ See note 5.

⁸ Kylstra, C. (2014, Feb). *10 Things Your Commute Does to Your Body*. TIME. Retrieved from <http://time.com/9912/10-things-your-commute-does-to-your-body/> on 12/01/15.

benefits to employees, and limit the services and improvements to infrastructure they wanted to implement.

As a result, from 2000 to 2015, unemployment in the target area has doubled, median household income has declined 13%, and the median house value is 20% less than housing values in the county and 52% less than housing values in Oregon. Meanwhile, the cost of housing for homeowners in the target area, which had taken only 18% of household income in 1990, in 2015 takes 27%. This lack of employment in general and the declining disposable income for target area residents diminish the local multiplier effect (i.e., the continual circulation of dollars within a local economy) that would be supported if target area residents could work in the target area at jobs that provided them with disposable income. High vacancy rates, low median household incomes, and high poverty rates in the target area have lowered the tax base and put a strain on local municipal services.

ii. Economic Effects of Brownfields: The economic hardship resulting from the loss of timber industry jobs has created a ripple effect throughout the county, particularly the target community, where the unemployment rate has doubled since 2000. The median household income of the target population surrounding the priority brownfield sites is 17% less than that of the county as a whole, as discussed in Section 1.a.ii. Sites with potential soil, surface water, and/or groundwater contamination are too high a risk for any potential developer to take on. There has therefore been disinvestment in the target area, which has led to blight and the devaluing of property. Housing values are 20% lower in the target area than in the county, and 52% lower than in the state.

Based on the preliminary inventory, known and suspected brownfields currently occupy 77 industrial and commercial parcels, or 512 acres (or 48%) of industrial and commercial land area, in the target community. Of these 77 parcels, 38 are underutilized and ten are vacant. The County incurs direct costs as a result of these underutilized and vacant properties. This includes management of noxious weeds, disposing of illegally discarded waste, and fire and/or police response to any criminal activity. Most importantly, these parcels are depriving the community of much-needed local jobs and a tax base. According to standard assumptions about the number of employees per square foot, the ten vacant suspected brownfield parcels, if redeveloped, could support more than 600 new jobs.⁹

2. PROJECT DESCRIPTION

a. Project Description, Redevelopment Strategy, and Timing and Implementation

i. Project Description and Alignment with Revitalization Plans: In order to address the brownfields listed in Section 1.a.iii, the County is requesting \$300,000 of CWA grant funding for assessment of petroleum and hazardous-substance sites. With the CWA funds, the applicant will complete an in-depth brownfield property assessment, eight Phase I ESAs, four Phase II ESAs, periodic meetings of a Brownfield Advisory Committee (BAC; further details in Section 3), a minimum of two community meetings, staff capacity and expertise building, and remedial action and reuse plans for two petroleum and two hazardous-materials sites. The assessment and resolution of contamination issues on these properties will likely bring economic activity and living-wage jobs back to the target community. The opportunities these properties present are detailed in the redevelopment strategies offered by the County's policies and plans (see Table 2).

The in-depth brownfield property assessment will build on the preliminary inventory and include a detailed analysis of available infrastructure (i.e., water, sewer, and transportation facilities). Proximity to existing infrastructure will be considered during the site selection process, as

⁹ Metropolitan Washington Council of Governments. (n.d.) *Round 7 Conversion Factors for Employment*. Retrieved November 6, 2017 from https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=2&cad=rja&uact=8&ved=0ahUKewik_ZCyrarXAhUX52MKHeXrDGAQFgguMAE&url=http%3A%2F%2Fwww.mwcog.org%2Fasset.aspx%3Fid%3Dcommittee-documents%2FZl1aVlHe20131217082723.pdf&usq=AOvVaw38hkUeJIGzps8ZX27s6iEt

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described in Section 2.a.ii, especially since expansion of wastewater systems is extremely restricted in the target area. The local community is actively engaged in planning for redevelopment (e.g., the recent preliminary inventory process) and will continue to be engaged throughout this project, as described in Section 3. The assessment and eventual resolution of contamination issues on these properties will allow for economic activity in the target area by reopening these high-value sites. Because of the lack of information regarding the existence, extent, or character of contamination that may be present on these properties, developers see them as high-risk. The properties would be well-suited to meet the demands for additional affordable housing stock and new employers; however, such development cannot take place while the properties' brownfield status remain unaddressed.

The many opportunities these properties present are recognized in the revitalization strategies incorporated in the County's policies and plans (see Table 2). Table 2 also shows how these plans and policies align with the USEPA goals of equitable development, sustainable practices, and/or the advancement of environmental justice. The brownfield properties that would be addressed through this CWA grant would play a critical role in furthering community development goals of increased public riverfront access, environmental restoration, improved public health outcomes, and economic development.

Table 2: Brownfield Project Proposed Redevelopment Strategies		
County Policies & Plans	Proposed Redevelopment Strategies	Alignment with USEPA Priorities
Marion County Comprehensive Plan	<ul style="list-style-type: none"> -Increasing employment opportunities -Development of a transportation system -Natural resource use that provides for tomorrow's needs, today's needs, and the protection of the environment -Development of a population distribution pattern in which most persons employed in an urban community live in and participate in the activities and government of that community 	<ul style="list-style-type: none"> -Promotes urban infill and smart growth. -Efficient use of existing infrastructure. -Fosters civic engagement of the entire community.
North Santiam Canyon Economic Opportunity Study (2014)	<ul style="list-style-type: none"> -Build the capacity of the region to attract and accommodate new job-creating development by investing in public infrastructure; -Seek to diversify the regional economy by supporting small business development in industries such as tourism; -Take measures to ensure that existing vacant industrial and commercial sites with environmental problem areas are cleaned up and ready for new uses; and -Improve the quality of life in North Santiam Canyon communities by strengthening schools and other public services and by taking steps to improve the appearance of communities. 	<ul style="list-style-type: none"> -Provide education and training opportunities to low-income communities. -Support retention and expansion of local businesses. -Promote economic development in underserved communities. -Efficient use of existing infrastructure and land.
Mid-Willamette COG Comprehensive Economic Development Strategy (2016)	<ul style="list-style-type: none"> -Reduce barriers and obstacles to economic development. -Support opportunities for workforce development. -Ensure adequate supply of developable land throughout the region. -Encourage downtown revitalization. -Provide technical support for adequate planning and managed growth. -Increase economic opportunities for disadvantaged and disenfranchised populations and individuals. -Coordinate regional economic development efforts with other agencies. 	<ul style="list-style-type: none"> -Provide education and training opportunities to low-income communities. -Support retention and expansion of local businesses. -Promote economic development in underserved communities. -Efficient use of existing infrastructure and land.

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Table 2: Brownfield Project Proposed Redevelopment Strategies		
County Policies & Plans	Proposed Redevelopment Strategies	Alignment with USEPA Priorities
Marion County Parks Master Plan (2010)	<ul style="list-style-type: none"> -Protect and enhance our natural and historical resources. -Provide diverse recreation opportunities that are responsive to changing community needs. -Provide an interconnected park system with opportunities for active transportation and recreation. 	<ul style="list-style-type: none"> -Promote urban infill and smart growth. -Expand access to activities to underserved communities. -Encourage active transportation.

ii. Redevelopment Strategy: Redevelopment strategies for priority properties will be based on the intersection of community interest, market feasibility, and regional goals for water quality. The County has invested and participated in a wide array of planning efforts, described in Table 2, which have built momentum behind the effort to understand sources of contamination and how to remediate them. The County is also in constant communication with regional partners, businesses, and developers as part of its revitalization, marketing, and recruitment efforts. These planning efforts and partnerships will keep the CWA grounded in financial feasibility. The BAC and community meetings will provide insight into the aspirations of the community for the future of priority sites. The County proposes to facilitate a development strategy workshop with owners of up to two properties. The workshop will bring in a team of experts in economic development, land use planning, and environmental cleanup to collaboratively formulate a redevelopment strategy with the owner that aligns cleanup and future use. As mentioned in Section 2.a.iii.(b), the identification of priority sites will incorporate locational advantages, including access to existing infrastructure and transportation systems. This approach will enhance financial feasibility by reducing infrastructure costs needed to support development.

iii. Timing and Implementation:

(a) Contractor procurement. Marion County anticipates hiring a contractor to implement the CWA project tasks, as described in Section 2.b.i below. Marion County will prepare a Request for Qualifications, within the first month of award. Proposals will be reviewed and scored based on qualifications and in accordance with County procurement rules and the USEPA procurement process. The most qualified contractor will be selected and Marion County will authorize signature to hire the contractor within the first three months of the project.

(b) For community-wide proposals, the development of site inventory or site identification process, and site prioritization and selection process. The initial priority brownfield sites (Section 1.a.iii) were selected based on the preliminary brownfield inventory and the sites' relationship to identified community revitalization goals, proximity to sensitive populations and water sources, potential employment opportunities from redevelopment and improved transportation connections, and location in the target area. A more expansive site selection process will be conducted during the initial phase of CWA implementation as part of the comprehensive site inventory process, and will continue as needed throughout the project. The comprehensive site inventory will combine existing data regarding parcel size, address, zoning, and current use with research on current and historical environmental concerns. Resources such as historical fire insurance maps and current environmental databases that are used in Phase I ESA site research will be accessed to identify sites with suspected or confirmed contamination. Web-based maps and forms will be developed to integrate this information and allow for editing in the field.

The selection of priority sites will merge technical analysis and input from the BAC and community. The criteria for prioritization will be vetted with the BAC but are likely to focus on public health and environmental risk, proximity to existing infrastructure, transportation access, market potential, status as vacant or underutilized, and impact on sensitive populations. Willingness and support of property owners will also be a key factor in prioritization. One of the community meetings will include a discussion regarding the prioritization and selection of sites.

The sites that are selected for assessment as a part of this grant will contribute to a larger planning effort that the City can continue after completion of the CWA process.

(c) Obtaining and securing site access. The County and its partners will proactively and cooperatively engage with property owners to explore interest in the CWA and obtain site access for Phase I/II ESA work. The County and its partners have extensive relationships and solid reputations in the community, on which they will capitalize in engaging property owners. Property owners are often reluctant to engage in environmental assessment, so the County and its partners will develop messages and approaches to help owners understand environmental risk and the benefits of assessments in positioning their property for redevelopment, leveraging the vast amount of regional work that has been done in an effort to improve regional water quality.

b. Task Descriptions and Budget Table

i. Task Descriptions: The scope of work has been organized into five tasks, as detailed below. For each task, the County proposes to leverage its own resources through County personnel in-kind labor contributions to assist with eligible activities. Outputs are in *italics* below and are outlined in Section 5.c, Table 7.

Task 1—Project Management and Programmatic Activities: (\$16,890, Grant-Funded Activities + \$4,000 leveraging): The County will leverage \$2,000/grant (42 hrs at \$35/hr) in County personnel costs for management/administration and other eligible activities to support project tasks. \$2,420/grant (22hrs at \$110/hr) is budgeted in this task as contractual costs for preparing *12 periodic reports* and other eligible activities to support project management. \$2,000/grant is for County staff (up to two) to *attend two three-day national conferences or state/regional conferences*. Estimated travel costs include airfare (\$400/person/conference = \$1,600) and hotel, meal, and incidental costs (\$200/person/day/conference = \$2,400). The County will devote \$4,025 (115 hrs at \$35/hr) of each grant budget to building programmatic capacity of County staff in managing a brownfield program throughout the lifecycle of the grant and beyond.

Task 2—Community Involvement and Health Assessment: (\$47,350, Grant-Funded Activities + \$3,080 leveraging): This task includes: 1) coordinating and conducting quarterly meetings with the BAC and two community meetings (see Section 3a); 2) integrating meaningful public input into the grant program implementation; 3) preparing and publishing public notices; 4) preparing meeting materials and presentations; and 5) preparing and distributing messaging and brochures and other public information. The community outreach budget includes \$8,800/grant (80 hrs at \$110/hr) for the County's consulting firm to *facilitate two community outreach meetings and four BAC meetings, produce project informational materials, and assist the County with site-specific outreach*. County staff will coordinate and facilitate the eight BAC meetings not facilitated by the consultant. County staff will also facilitate an ATSDR Action Model for health education and assessment. County staff budget for implementing the ATSDR model is assumed to be \$14,875/grant (425hrs at \$35/hr) for program development, materials, and meeting facilitation. The County will leverage \$1,540/grant (44hrs at \$35/hr) in personnel costs to assist with community outreach activities.

Task 3—Inventory, Prioritization, and Eligibility Determinations (EDs): (\$14,300 Grant-Funded Activities + \$2,800 leveraging): The County will build on the database and research inventory created to engage the community in a comprehensive site identification, prioritization, and ED process. The first step in this task will be supplementing the data compiled during the initial priority site selection with additional information from existing public and proprietary databases. This will include a review of historical records and current environmental databases. The County and contractor will perform the following activities as part of this task: 1) conduct *tours/ windshield surveys of brownfield sites* throughout the target area to confirm potential petroleum and hazardous-substance brownfield sites, as well as to verify current conditions, development opportunities, and constraints; 2) survey local developers, real-estate industry representatives, property owners, and other stakeholders to gauge interest in the program and collect additional site information to supplement the inventory; 3) work with the AC and partners listed in Section 3 to confirm selection criteria and rank sites based on community priorities;

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4) produce a *Site Inventory and Prioritization Report*; and 5) complete EDs for the top-priority opportunity sites. The budget leverages \$1,400/grant of County personnel costs (40 hrs at \$35/hr) to assist with inventory, prioritization, and ED activities. The budget (for each grant) includes contractual services of \$7,150 (65 hrs at \$110/hr) to perform the tasks and deliver the outputs listed above.

Task 4—Phase I ESAs: (\$40,000 Grant-Funded Activities + \$1,400 leveraging) Under direction of the County, the contracted environmental consulting firm will complete *an estimate of eight Phase I ESAs* at up to four high-priority petroleum and four hazardous-substance brownfield sites. Phase I ESAs will be performed consistent with the All Appropriate Inquiries Final Rule and the standards set forth in the ASTM E1527-13 Phase I ESA Process. The contractor will complete Phase I ESAs, including health and safety plans (HASPs), and ACRES updates, at an average cost of \$5,000 (total cost of \$20,000/grant). The County will leverage \$700/grant (25hrs at \$35/hr) in personnel costs to assist with data acquisition, report review, and distribution.

Task 5—Phase II ESAs, Analysis of Brownfield Cleanup Alternatives (ABCAs), and Cleanup Action Planning (CAP): (\$181,400 Grant-Funded Activities+\$2,800 leveraging) The environmental contractor will perform the following activities: 1) preparation of a comprehensive *Quality Assurance Project Plan (QAPP)* at an estimated cost of \$6,000 (\$3,000/grant); 2) completion of *Phase II ESAs at two high-priority petroleum and two hazardous-substance sites* (average cost of \$35,000/site [\$70,000/grant]); 3) preparation of an *ABCA at one petroleum and one hazardous-substance site* (average costs of \$10,000/grant); and 4) *up to two CAPs* (average cost of \$16,000/grant). Included in the contractual cost is \$1,700/grant for *developing and printing graphic materials* (\$1,600) and *public notice mailings* (\$400). The County will leverage \$1,400/grant (40 hrs at \$35/hr) in personnel costs to assist with data acquisition and report review and distribution.

ii. Budget Table:

Table: 3 Project Budget Table						
Budget Categories	Hazardous Substance Funds—Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	
<i>Programmatic costs only</i>	<i>Project Management & Programmatic Activities</i>	<i>Community Involvement & Health Assessment</i>	<i>Inventory, Prioritization, & EDs</i>	<i>Phase I ESAs</i>	<i>Phase II ESAs, ABCA and CAP</i>	Total
Personnel	\$4,025	\$14,875	\$0	\$0	\$0	\$18,900
Travel	\$2,000	\$0	\$0	\$0	\$0	\$2,000
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$2,420	\$8,800	\$7,150	\$20,000	\$90,700	\$129,070
Total Haz Subs Funds	\$8,445	\$23,675	\$7,150	\$20,000	\$90,700	\$149,970
Budget Categories	Petroleum Funds—Project Tasks					
	Task 1	Task 2	Task 3	Task 4	Task 5	
<i>Programmatic costs only</i>	<i>Project Management & Programmatic Activities</i>	<i>Community Involvement & Health Assessment</i>	<i>Inventory, Prioritization, & EDs</i>	<i>Phase I ESAs</i>	<i>Phase II ESAs, RAPs and AWP</i>	Total
Personnel	\$4,025	\$14,875	\$0	\$0	\$0	\$18,900
Travel	\$2,000	\$0	\$0	\$0	\$0	\$2,000
Supplies	\$0	\$0	\$0	\$0	\$0	\$0
Contractual	\$2,420	\$8,800	\$7,150	\$20,000	\$90,700	\$129,070
Total Petro	\$8,445	\$23,675	\$7,150	\$20,000	\$90,700	\$149,970

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Table: 3 Project Budget Table

Funds						
Total EPA Grant	\$16,890	\$47,350	\$14,300	\$40,000	\$181,400	\$299,940

c. Ability to Leverage

The proposed CWA project supports multiple ongoing planning efforts that are currently funded through distinct programs, with the opportunity to pursue additional future resources. To date, the County has leveraged \$140,000. The following table provides a list of resources that have been secured, are pending, or are potential sources of additional funds that could further the efforts of the CWA grant. Additionally, past examples of leveraged resources indirectly related to the CWA project have been listed. See attached proof of the listed, secured, leveraged resources.

Table 4: Leveraged Resources

Source	Purpose/Role	Amount (\$)	Status
County personnel in-kind labor contributions	County staff will designate time to the project to assist with eligible activities	\$13,020	Pending Grant Award
Total Amount Leveraged for Cleanup: \$13,020			
Source	Purpose/Role	Amount (\$)	Status
Past Examples of Leveraged Resources			
Marion County- Oregon Video Lottery Dollars	North Santiam Regional Wastewater Feasibility and Land Analysis- Cost Share	\$50,000	Secured- Completed
Marion County- Oregon Video Lottery Dollars	Project Management, in-kind staffing, and meeting expenses for North Santiam region-wide wastewater development (2 years, .5 FTE)	\$85,000	Ongoing
Marion County- Oregon Video Lottery Dollars	Value of Water- Economic Analysis of North Santiam Watershed- Cost Share	\$5,000	Pending- Ongoing
Total Amount Leveraged in 2015-2017: \$140,000			

3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan: The County has extensive experience engaging the target area community in planning and capital improvement projects. Throughout the CWA process, the County will use methods that have proven to be effective and equitable. In particular, the community and other, public- and private-sector, partners will be involved in the BAC (these commitments are stated in Section 3.c). The BAC will give these representatives a seat at the table in formulating the approach of the CWA and key decisions involved in its implementation. The BAC will meet on a regular basis and will be actively engaged in cleanup and redevelopment plans. Broader engagement of the community will include the following:

- *Public open house events:* Once the brownfield inventory is complete, the results will first be reported to the BAC for their analysis and input regarding prioritization and site selection. An open house will be held for the community to review the brownfield inventory and discuss prioritization. Later in the CWA project, the community will be updated as to the progress of Phase I/II ESAs and the progress of the project.
- *Stakeholder and small group outreach:* The County will conduct meetings with key stakeholders, businesses, and community groups to engage them in identification of potential brownfield properties, priorities, and redevelopment opportunities. The County has found that meeting one-on-one with stakeholders is the most effective method of engaging members of this community who do not typically attend public meetings.
- *Web-based communications:* The County increasingly uses Web-based tools to engage community members. The County will establish a dedicated Web page for this project that

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will be updated to track the assessment project. Community members have used these Internet resources as a library for information on previous community planning projects.

As previously stated, the County is committed to an open and equitable process. The County will ensure that all public meetings are accessible and will provide materials upon request.

ii. Communicating Progress: The community involvement plan described above is meant to engage the appropriate stakeholders at the appropriate time. The BAC will be the most engaged group on the project and will have representatives from a wide variety of interest groups, including members of the target community. The BAC members have connections both in the target community and throughout the county and are able to talk with other community members about the project. All BAC meetings will be open to the public. Public meetings will be used when community input is needed during key project milestones, such as site prioritization, site selection, understanding the results of Phase I and Phase II ESAs, and cleanup and redevelopment planning. The BAC will continue to engage the target-area community through the methods currently used, such as notifications in the newspaper, e-mail newsletters, and public meetings.

A Website dedicated to the project will be created as the information center of the project, where all community members can access BAC meeting agendas, materials, and minutes; find out when the next meeting is taking place; obtain important project updates; access online surveys; and review community meeting materials and summaries. Past outreach efforts have indicated that most attendees are getting information from local social groups, local newspapers such as The Canyon Weekly and The Stayton Mail, as well as the local radio station KYAC, so this should be an effective method of communication. The County will also update *Statesman Journal* reporters and work with the paper to regularly publish about this project and the opportunities for public input and direction.

b. Partnerships with Government Agencies

i. Local/State/Tribal Environmental Authority: The County has actively partnered with the Brownfield Program run by Business Oregon. Business Oregon has provided funding for several recent projects that help advance the County's objectives in the target area. This support includes funding for the 2016 inventory and wastewater study that helped frame the need for redevelopment in the North Santiam corridor. Business Oregon is committed to the county and the target area, including, its commitment to provide funding for a Vision-to-Action workshop to help engage the local community in planning for redevelopment of high-priority brownfields.

ii. Other Governmental Partnerships:

Table 5: Public-Sector Organizations Committed to Supporting the CWA Grant Project	
Organizations—Public	Brownfields Initiative Role
City of Idanha	Will participate to identify additional Brownfield sites and act as a resource for the County when assessing future development scenarios.
City of Detroit	Will participate to identify additional Brownfield sites and act as a resource for the County when assessing future development scenarios.
City of Gates	Will participate to identify additional Brownfield sites and act as a resource for the County when assessing future development scenarios.
City of Mill City	Will participate to identify additional Brownfield sites and act as a resource for the County when assessing future development scenarios.
Oregon Department of Environmental Quality (ODEQ)	Will support efforts to minimize hazardous materials in the watershed through Brownfields identification, assessment, and mitigation efforts.
Business Oregon	Will contribute additional funds and expertise to complementary projects and necessary infrastructure to promote economic development in the North Santiam Region.
Oregon Health Authority	Will contribute expertise to this and other complementary projects and necessary infrastructure to promote economic development in the North Santiam Region.
Regional Solutions-Governor's Office	Will contribute support necessary to promote economic development in the North Santiam Region.

c. Partnerships with Community Organizations

i. Community Organization Description & Role: The County has been able to work successfully with many of its local community groups and is an active participant in community-wide advocacy for economic development, redevelopment, and environmental challenges. Because of the County's participation in these efforts, many of these organizations are comfortable committing support in implementing future revitalization and planning efforts.

Table 6: Community-Based Organizations Committed to Supporting the CWA Grant Project	
Organizations—Private	Brownfields Initiative Role
North Santiam Chamber of Commerce	Will participate in an advisory role in future development scenarios.
Organizations—Nonprofit	Brownfields Initiative Role
Mid-Willamette Council of Governments	Will participate in identification and mitigation planning for brownfield sites in the watershed. Will participate on Brownfields revitalization and vision and future assistance to obtain funding for mitigation stages.
North Santiam Watershed Council	Will participate in identification and mitigation planning for brownfield sites in the watershed

ii. Letters of Commitment: Letters of commitment for each organization listed above, detailing past roles and future commitments are attached.

d. Partnerships with Workforce Development Programs

- The local workforce development organization, INCITE, is currently in a transitional stage and are not immediately available to assist in this endeavor. In the next year, the County intends to further utilize their expertise and leverage their assets to identify opportunities to create local opportunities for employment in the North Santiam region.

4. PROJECT BENEFITS

a. Welfare, Environment, and Public Health Benefits

Assessment of the priority brownfields sites is the first step toward converting them into community resources and employment opportunities. Currently, the presence of brownfields in Marion County in general, and specifically in the target area, is creating a myriad of welfare, environmental, and public health issues. This includes blight; lack of access to community services and transportation; impacts to endangered species; and high levels of cancer deaths, cardiovascular disease, lead exposure, and obesity, as described in Section 1.b. The four priority brownfield sites listed in Section 1.a.iii are located strategically along the target area corridor and represent catalyst sites that could trigger further redevelopment. Assessing and addressing the constraints caused by potential contamination will reduce perceived risk to developers; the redevelopment of these properties will contribute significantly to the reduction of blight in the target area.

The primary benefit of assessing of key brownfields is the facilitation of redevelopment of high-profile, well-located properties in the target area. Without assessing the extent of contamination on these sites creates risk and discourages potential developers from taking advantage of potentially shovel-ready land. Furthermore, any redevelopment will be infill development, using the existing infrastructure to improve the target area's built environment. Redevelopment will attract more people who want to live and work in the area, creating both the tax base and a demand to support more community and transportation services, which are currently lacking, as described in Section 1.b. Providing local jobs and increasing the availability of transportation will contribute to obesity reduction by, respectively, decreasing commuting and promoting more active forms of transportation.

Outputs, such as the Phase I and Phase II ESAs and the cleanup plans, will address the severe risks that vapor intrusion and leaking of petroleum and other carcinogenic chemicals into the ground pose to the health of the residents who live within a quarter mile of these sites. Currently,

the target community experiences environmental injustice in which the most impoverished citizens are exposed to the greatest health risks. This can be addressed through a CWA process. Environmental impacts to the North Santiam River, a major waterway and the source of drinking water for the Salem metro area, can also be addressed through assessment and cleanup planning. All four of the priority brownfields discussed in Section 1.a.iii. are within 500 feet of the North Santiam River, or a direct tributary of the North Santiam River. This means that fish and other wildlife are being exposed to a large number of carcinogenic chemicals (see Section 1.b), as well as lead. These impacts extend to the 225,000 people downstream relying on the North Santiam River for drinking water. Phase I / II ESAs will allow the County to establish where the worst impacts to groundwater are occurring and create plans to clean them up.

b. Economic and Community Benefits

The CWA grant will allow the County to carry out actions that intend to lead to positive economic outcomes and revitalize the target area. The grant program will improve the local economy through assessment of current brownfields that, if developed, will enhance job creation and kick-start economic development and private investment in the region. Phase I and Phase II ESAs may determine in certain cases that only a small amount of cleanup is necessary for redevelopment. Cleanup plans for more complex sites will give the County a way to move properties closer to redevelopment. According to standard assumptions about the number of employees per square foot, the ten vacant suspected brownfield parcels, if redeveloped, could potentially support more than 600 new jobs. Any enhanced value in property or utilization provides additional net tax benefits to the County and thereby reducing the amount of undercompensated services provided in this rural, economically distressed region.

- Non-economic

- Alignment with local brownfield revitalization policies (Section 2.a.i)
- Alignment with other County projects in the region, such as broadband internet service, regional wastewater services, business resiliency efforts, recreational marina infrastructure, transportation and roadway improvements and rural health efforts
- Ability to provide social functions: space for recreation, farmers' markets, and opportunities for exercise
- Ability to provide social spaces: coffee shop, plaza, dog park, community gathering space for intentional and chance encounters

The CWA process will also support noneconomic community benefits, such as increased access to green space and active modes of transportation. As discussed in Section 2.a.i, Marion County plans and policies prioritize access to open space and the construction of continuous trails. Progress toward these ends can be marked by making green infrastructure a priority in the redevelopment planning done by the community. Additional community meetings will further extract the target community's priorities for future revitalization.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Audit Findings

No reported problems with the administration of any past grant programs have been reported. The County's last audit was completed and a report issued on December 21, 2016 with no findings.

b. Programmatic Capability

Danielle Gonzalez is a Management Analyst with the Marion County Community Services Department. In her economic development role, Ms. Gonzalez will serve as the North Santiam Brownfields Project Coordinator in collaboration with the above supporting organizations. Ms. Gonzalez has more than 12 years working on the enforcement and implementation of programmatic and regulatory policies with federal and state agencies. Ms. Gonzalez will have

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the support of the county's health division, economic development and federal contracts compliance offices.

c. Measuring Environmental Results: Anticipated Outputs/Outcomes

Table 7 lists the outputs, outcomes, and tracking methods associated with the project tasks described in Section 2.b.i.

Table 7: Measuring Environmental Results	
Task	Methods of Tracking and Measuring Progress
1. Project Management and Programmatic Activities	Outputs: Quarterly reports, annual DBE reports, project closeout report Outcomes: Proactive and effective management of project activities; tracking of results Tracking Methods: Delivery of reports; communication with USEPA Region 10 staff
2. Community Involvement	Outputs: Public involvement plan, webpage, informational material (translation provided upon request), four BAC meetings, two public meetings and meeting minutes Outcomes: An informed and engaged community Tracking Methods: Number of meetings held and attendance; post-meeting surveys
3. Inventory, Prioritization, and EDs	Outputs: Site inventory and prioritization report, web-based viewer Outcomes: Comprehensive database of known and potential brownfields Tracking Methods: Delivery of complete geodatabase; engagement with eligible property owners to discuss grant opportunities
4. Phase I ESAs	Outputs: Ten ESA reports (five hazardous materials, five petroleum), HASP, ACRES updates Outcomes: Identify and address recognized environmental conditions (RECs) on brownfield properties Tracking Methods: ACRES updates; property transactions
5. Phase II ESAs, RAPs, and AWP	Outputs: QAPP, SSSAPs/HASPs, six Phase II ESA reports (three hazardous materials, three petroleum), two RAPs (one hazardous materials, one petroleum), AWP reports Outcomes: Characterize and analyze environmental conditions on sites where addressing RECs is required; a community vision for future redevelopment Tracking Methods: Properties assessed and remediated; property transactions; clean plans; and redevelopment vision documents

d. Past Performance and Accomplishments

ii. Has Not Received a USEPA Brownfields Grant, but has Received Other USEPA Federal Funds or Nonfederal Assistance Agreement

1. Purpose and Accomplishments

Marion County managed more than \$11 million in federal funding the year ending June 30, 2016.

Table 8: Environmental Protection Agency Funds Managed Year Ending June 30, 2016	Federal CFDA Number	Pass Through Organization	Pass- Through Identifying Number	Federal Expenditures
State Public Water System Supervision	66.432	Oregon Health Authority	148022	\$44,178
Drinking Water State Revolving Fund: Capitalization Grants for Drinking Water	66.468	Oregon Health Authority	148022	\$21,115

The Marion County Federal Grant Compliance Audit Report has a complete year ending June 30, 2016 breakdown of federal grants by federal agency.

2. Compliance with Grant Requirements

From the Independent Auditor's Report for each Major Federal Program; Internal Control Over Compliance; and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance as written by Grove, Muelle & Swank, P.C.,

“Opinion on Each Major Federal Program

[REDACTED]

INTERGOVERNMENTAL AGREEMENT

County No. _____ OBDD No. C2016246

Title: Cost Sharing agreement for

North Santiam Canyon Regional Wastewater Analysis and Land Inventory

As authorized by ORS 190.110, this Grant Agreement (“Agreement”) is between the State of Oregon acting by and through its Oregon Business Development Department (“OBDD”) and Marion County, a political subdivision of the state of Oregon (“County”). OBDD and County (each a “party” and together the “parties”) may be contacted at the address(es) or number(s) below:

OBDD Contact	County Contact
Project Contact: Karen Homolac Title: Brownfields Specialist Address: Business Oregon 775 Summer Street NE Suite 200 Salem OR 97301-1280 Phone: 971-239-9951 Email: karen.homolac@oregon.gov	Project Contact: Danielle Gonzalez Title: Management Analyst Address: Marion County Community Services Courthouse Square, 3rd floor Salem, Oregon Phone: 503-589-3235 Email: dgonzalez@co.marion.or.us

- 1. Effective Date and Duration.** This Agreement becomes effective on the date every party has signed it (“Effective Date”). The availability of funds under this Agreement will terminate on completion of the Project (as defined below), acceptance by County of all deliverables, and all payments made.
- 2. Statement of Obligations.** OBDD and County agree to perform their respective obligations in accordance with the terms and conditions of this Agreement, and as more fully described in Exhibit A.
- 3. Consideration, Payment Terms.** County will provide OBDD with up to \$50,000 (the “Grant”) in funding for the project tasks described in Exhibit A (the “Project”). County will disburse the Grant funds to OBDD following execution of this Agreement in accord with the requirements in Exhibit A.
- 4. Assignments.** Neither party may assign or transfer any of its interest in this Agreement, without the other’s prior written consent. An assignment or transfer of an interest in this Agreement will not relieve a party of any of its duties or obligations under this Agreement.
- 5. Amendments.** Unless otherwise expressly provided in this Agreement, the terms of this Agreement may only be amended by written instrument signed by both parties.
- 6. Representations, Warranties.** Both parties represent to the other that:
 - (a) It is duly organized and validly existing under Oregon law, and has the power and authority to enter into and perform this Agreement.
 - (b) The making and performance of this Agreement (1) has been duly authorized by all necessary action, (2) does not and will not violate any provision of any applicable law, rule, regulation, or order of any court, regulatory commission, board, or other administrative agency or any provision of an applicable charter or other organizational document and (3) does not and will not result in the breach of, or constitute a default of, or require any consent under, any other agreement or instrument to which it is party or by which it may be bound or affected. No further authorization, consent, license, approval of, or filing or registration with or notification to any

governmental body or regulatory or supervisory authority is required for the execution, delivery or performance of this Agreement.

- (c) This Agreement has been duly executed and delivered and constitutes a legal, valid and binding obligation enforceable in accordance with its terms.

7. Records Maintenance; Access. Each party will maintain all fiscal records relating to this Agreement in accordance with generally accepted accounting principles, and will maintain any other records pertinent to this Agreement in such a manner as to clearly document that respective party's performance. Each party acknowledges and agrees that the other party and their duly authorized representatives have access to such fiscal records and other books, documents, papers, plans and writings that are pertinent to this Agreement to perform examinations and audits and make excerpts, transcripts or copies.

8. Termination. In addition to any other termination rights hereunder, this Agreement may be terminated upon mutual written consent of both parties. All duties and obligations of the parties under this Agreement cease upon termination of this Agreement other than (a) the rights and obligations arising from a party's default hereunder, (b) OBDD's obligation to return to County, within 30 days of Agreement termination, any Grant funds disbursed to OBDD that were not or are not expended on or obligated for the Project prior to termination of this Agreement ("Overpayments"), (c) any reporting obligations, (d) any rights or obligations accrued to a party under this Agreement prior to termination, and (e) any other provision of this Agreement that, by its express terms, survives termination of this Agreement.

9. Defaults and Remedies. Either party will be in default upon the occurrence of any of the following events:

- (a) It fails to perform, observe or discharge any of its covenants, agreements or obligations under this Agreement other than as provided in subsections (b) and (c) below, and that failure continues for a period of 30 calendar days (or such longer period as the other party may determine in writing) after written notice specifying such failure is given to the applicable party.
- (b) Any representation, warranty or statement made in this Agreement or in any documents or reports relied upon by the other party to measure progress on the Project, the expenditure of funds or the performance by a party is untrue in any material respect when made.

In the event of default, a party may, at its option, pursue any or all of the remedies available to it under this Agreement and at law or in equity, including, but not limited to: (a) immediate termination of this Agreement, (b) requiring repayment of the Grant funds disbursed to OBDD and all interest earned by OBDD on those Grant funds, (c) reducing or withholding payment future disbursements of Grant funds, (d) initiation of an action or proceeding for damages, specific performance, or declaratory or injunctive relief, or (e) exercise of its right of recovery of Overpayments under this Agreement or setoff, or both. These remedies are cumulative to the extent the remedies are not inconsistent, and a party may pursue any remedy or remedies singly, collectively, successively or in any order whatsoever.

10. Funds Available and Authorized. County has sufficient funds currently available and authorized for expenditure to finance the costs of this Agreement within County's annual budget appropriation.

11. Ownership and License. All intellectual property rights and all work product created in relation to the Project, including derivative works and compilations ("Work Product"), are the exclusive property of OBDD.

OBDD grants to County a revocable, non-exclusive, perpetual, royalty-free license to use, make, reproduce, prepare derivative works based upon, distribute copies of, perform and display the Work Product, and to authorize others to do the same on County's behalf.

12. Notices. Except where otherwise expressly provided in this Agreement, any notices to be given hereunder shall be given in writing by personal delivery, mail (postage prepaid), or email at the address set forth on page 1 of this Agreement, or to such other addresses either party may hereafter indicate. Any notice so addressed and mailed will be deemed to be given five (5) days after mailing. Any notice by personal delivery shall be deemed to be given when actually delivered. Any such notice delivered by email will be effective on the day the transmitting machine generates a receipt of successful transmission, if transmission was during the normal business hours of the recipient, or on the next business day, if transmission was outside the normal business hours of the recipient. To be effective against a party, any such notice transmitted by email must be confirmed by telephone notice to that party.

13. Mutual Indemnification.

- (1) To the extent allowed by the Oregon Tort Claims Act, County shall defend (subject to ORS chapter 180), save, hold harmless and indemnify the State of Oregon and OBDD, and their subdivisions, officers, directors, employees and agents, from and against all claims, suits, actions, losses, damages, liabilities, costs and expenses of any nature whatsoever resulting from, arising out of or relating to the acts or omissions of County or its officers, directors, employees, subcontractors or agents under this Agreement.
- (2) OBDD shall defend, save, hold harmless and indemnify County and its subdivisions, officers, directors, employees and agents, from and against all claims, suits, actions, losses, damages, liabilities, costs and expenses of any nature whatsoever, resulting from, arising out of or relating to the acts or omissions of OBDD or its officers, directors, employees, subcontractors or agents under this Agreement.

This Section 13 survives termination of this Agreement.

14. Disclaimer of Warranties; Limitation of Liability.

- (1) Neither party makes any warranty or representation, either express or implied, related to the Project.
- (2) Neither party nor its agents are liable or responsible for any direct, indirect, incidental, special, consequential or punitive damages in connection with or arising out of this Agreement, the Project, or OBDD's use of these grant funds.

15. Successors in Interest. The provisions of this Agreement are binding upon and inure to the benefit of the parties, and their authorized successors and assigns.

16. Third-party Beneficiaries. OBDD and County are the only parties to this Agreement and entitled to enforce its terms. Nothing in this Agreement gives, is intended to give, or may be construed to give any direct or indirect benefit or right to third persons unless such third persons are individually identified by name and expressly described as intended beneficiaries of this Agreement.

17. Choice of Law; Designation of Forum; Federal Forum. The laws of the State of Oregon (without giving effect to its conflicts of law principles) govern all matters arising out of or relating to this Agreement, including, without limitation, its validity, interpretation, construction, performance, and enforcement. Any party bringing a legal action or proceeding against any other party arising out of or relating to this Agreement shall bring the legal action or proceeding in the Circuit Court of the State of Oregon for Marion County (unless Oregon law requires that it be brought and conducted in another county). Each party consents to the exclusive jurisdiction of such court, waives any objection to venue, and waives any claim that such forum is an inconvenient forum.

Notwithstanding the paragraph above, if a claim must be brought in a federal forum, then it must be brought and adjudicated solely and exclusively within the United States District Court for the District of Oregon. This paragraph applies to a claim brought against the State of Oregon only to the extent Congress has appropriately abrogated the State of Oregon's sovereign immunity and is not consent by


the State of Oregon to be sued in federal court. This paragraph is not a waiver by the State of Oregon of any form of defense or immunity, including but not limited to sovereign immunity and immunity based on the Eleventh Amendment to the Constitution of the United States.

18. **Merger Clause.** This Agreement (including Exhibits that are by this reference incorporated herein) constitutes the entire agreement between the parties on the subject matter hereof. No waiver or consent regarding any of the terms of this Agreement will bind either party unless in writing and signed by the party against whom such waiver or consent is sought to be enforced. Such waiver or consent will be effective only in the specific instance and for the specific purpose given. There are no understandings, agreements, or representations, oral or written, not specified herein regarding this Agreement. All parties, by the signature below of their authorized representatives, hereby acknowledge that they have read this Agreement, understand it and agree to be bound by its terms and conditions.
19. **Severability.** The parties agree that if any term or provision of this Agreement is declared by a court of competent jurisdiction to be illegal or in conflict with any law, the validity of the remaining terms and provisions will not be affected, and the rights and obligations of the parties are to be construed and enforced as if the Agreement did not contain the particular term or provision held to be invalid.
20. **Survival.** All rights and obligations of the parties under this Agreement cease upon termination of this Agreement, except as described in Sections 8 and 13.
21. **Time of the Essence; Force Majeure.** Time is of the essence in the performance of each and every obligation and duty under this Agreement. Neither Party is responsible for any failure to perform or any delay in performance of any obligations under this Agreement caused by fire, civil unrest, labor unrest, natural causes, or war which is beyond that Party's reasonable control.
22. **Neutral Construction.** This Agreement has been negotiated with each party having the opportunity to consult with legal counsel and will be construed without regard to which party drafted all or part of this Agreement.
23. **Counterparts.** This Agreement may be executed in several counterparts, all of which when taken together constitute one agreement binding on all parties, notwithstanding that all parties are not signatories to the same counterpart. Each copy of the Agreement so executed constitutes an original.

Signatures follow



STATE OF OREGON
acting by and through its
Business Development Department

By: 
Chris Cummings, Assistant Director

Date: 7-26-16

Approved as to State Legal Sufficiency in
accordance with ORS 291.047:

Not required as per OAR 137-045-0030



MARION COUNTY

By: 
Tamra Goettsch - Department Director

Date: July 19, 2016

By: NA
John Lattimer - Chief Administrative Officer

Date: _____

By:  7/22/16
Marion County Legal Counsel

By:  7/20/16
Marion County Contracts & Procurement

EXHIBIT A

Background and Project Description

The Oregon Business Development Department, on behalf of the governmental partners having an interest in the North Santiam Canyon, issued a Request for Proposals for seeking qualified environmental, planning or engineering consultants to complete work that will result in a “North Santiam Canyon Regional Wastewater Analysis and Land Inventory” report, which will be used to inform OBDD management, Marion County, the communities of the North Santiam Canyon region (Mehama, Lyons, Mill City, Gates, Detroit, and Idanha) (the “Region”), the Governor’s Regional Solutions Team, the Oregon Legislature, and other state and federal funding entities.

The lack of community wastewater systems in Idanha, Detroit, Gates, Mehama and Lyons (all five communities are on individual septic systems only) and the need for upgrades to Mill City’s wastewater facility and system is identified as a limiting factor to economic and community development in the Region. Over the years numerous studies have been undertaken to determine the feasibility and design of a wastewater system to meet the individual needs of Detroit, Idanha and Gates. The distressed nature of the communities along with the challenge of designing an individual system in compliance with the “Three Basin Rule” have proven cost prohibitive. OBDD has issued a contract for a comparison of alternative approaches.

Additionally, the 2014 North Santiam Canyon Economic Opportunity Study completed by the Mid-Willamette Valley Council of Governments identified several economic development issues, such as inadequate community infrastructure; depressed property values, along with vacant and deteriorated buildings; environmental concerns with commercial and industrial properties; regional economy still largely dependent on the forest products industry; and low income levels and lack of employment opportunities. OBDD has issued a contract for an interactive (i.e. GIS) database identifying all commercial and industrial zoned properties in the Region; a ranking of the identified commercial and industrial-zoned properties according to readiness to develop or redevelop; an analysis of the impact that redevelopment of commercial- and industrial-zoned properties would have on existing infrastructure; and identification of all properties, by zoning type, that fall below the current minimum lot sizes for septic system drain fields.

Obligations

OBDD will administer consultant contracts with A) Keller Associates for the wastewater analysis described above, and B) with Maul, Foster, Alongi for the regional land inventory described above.

County will participate on the Technical Review Committee/Technical Advisory Group for each contract, and moderate/facilitate as necessary. County may provide meeting facilities as agreed between the project contacts.

County will have the opportunity to review the Wastewater draft report to seek clarification and provide feedback for consideration by the consultants prior to issuance of a final report. OBDD will share copies of deliverable products with County.

Project Schedule

OBDD expects preliminary results in summer 2016, and a final report is due by 30 September 2016.

Project Budget

OBDD identified an initial budget of \$50,000.00 for this project, and County is matching that with \$50,000.00. The two consulting services contracts executed by OBDD do not exceed that amount. Any contract amendments to increase compensation paid to consultants is the responsibility of OBDD unless County agrees to an amendment to this Agreement.

Disbursement of Funds

County will disburse the Grant funds to OBDD for the Project on cost-incurred basis. OBDD will invoice County for 50% of consultant contact expenses not to exceed \$50,000.00. OBDD will provide County with a final accounting report upon completion of the Project.



**REGIONAL SOLUTIONS OFFICE
GOVERNOR KATE BROWN**

November 16, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Administrator Scott Pruitt:

On behalf of Governor Brown's Regional Solutions Program in the Mid-Valley, I strongly support Marion County's application for an EPA Brownfields Community-Wide Assessment Grant that focuses on the North Santiam Watershed boundary areas. This project caught our attention because of its alignment with the region's priorities for economic development by focusing on local infrastructure assessments to produce private market responses leading to business retention and expansion opportunities.

Our understanding is that Marion County would use the grant to first identify and assess specific sites throughout the North Santiam Watershed to provide a pathway to remove economic, programmatic, social, and environmental barriers for the reuse of the properties. The plan after the assessment phase is flexible depending on what the assessment reveals, but there is specific interest in better positioning business owners that are taking on debt for septic upgrades that would not be assumable upon the local formation of a special sewer district.

The Mid-Valley Regional Solutions Program has been significantly involved in community and economic development efforts in the North Santiam Watershed, especially with efforts for helping anchor-institution and traded-sector businesses be more resilient as well as the scoping of a professionally managed regional sewer district. We will continue to be involved with these projects and others, and we look forward to seeing the integration of this grant opportunity with our other efforts in the near future.

Please consider awarding Marion County the resources to make this project a realization and help actualize the county, region, and Governor's priorities.

Sincerely,

James LaBar

Governor Kate Brown's Regional Solutions Coordinator – Mid Valley



November 13, 2017

Administrator Scott Pruitt
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

RE: Marion County, Oregon – FY 2018 Brownfields Community-Wide Assessment Grant Proposal

Dear Mr. Pruitt:

I am writing to express my support on behalf of the Oregon Business Development Department (Business Oregon) for the Brownfields Community Wide Assessment Grant Proposal (Proposal) being submitted by the Marion County (County) with regional focus on the North Santiam River Watershed (Region) and the communities of Mehama, Mill City, Gates, Detroit, Idanha, Turner and Stayton.

Historically, employment in the region was largely dependent on logging, mills, and wood products with each of the communities home to a mill or other timber industry-related facility. Over the past 30 years, cutbacks in the forest along with a multitude of economic disruptions resulted in rapid declines in access to their core natural resource based industry – timber. Diversification of the region's economy is paramount to counter the persistent vacant and underutilized industrial and commercial zoned properties that remain prevalent throughout the region. The County's Proposal highlights the actions it will take to address not only environmental concerns associated with sites but also the ongoing outreach efforts necessary to engage and provide assistance to these communities such that social, health, and economic needs of all residents are provided with a path forward to creating vibrant sustainable communities with critically needed jobs. Finally, this Proposal will allow the County to establish a robust regionwide brownfield revitalization program that utilizes a baseline of information already developed to ensure that concerns about contamination on a property do not pose a barrier to its productive reuse.

Business Oregon supports communities' economic planning efforts which lead to the creation of jobs through the redevelopment of employment lands. In particular, in 2016 through its Brownfields Program, Business Oregon assisted the County with \$60,000 grant funding to identify, inventory and prioritize vacant, blighted and/or underutilized properties throughout the Region. Additional funding assistance through Business Oregon's brownfields program, especially for cleanup activities, is available for both public and private property owners. Furthermore, Business Oregon manages a number of public infrastructure and business financing programs which are available to assist with the redevelopment of properties and the building of capacity to attract, retain, and expand job creating businesses.

Business Oregon strongly supports and I sincerely hope that the U.S. Environmental Protection Agency (USEPA) approves funding for this proposal. I can be reached at (971) 239-9951 if you or the USEPA have any questions about the range and versatility of Business Oregon's business, infrastructure and brownfields financing programs.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Homolac". The signature is fluid and cursive, with the first name "Karen" and last name "Homolac" clearly distinguishable.

Karen Homolac
Brownfields Program Specialist



PUBLIC HEALTH DIVISION
Center for Health Protection

Kate Brown, Governor



800 NE Oregon Street, Suite 640

Portland, OR 97232

Phone: (971) 673-0977

Fax: (971) 673-0979

TTY: (971) 673-0372

November 6, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Support for Marion County, Oregon
EPA Brownfield Area-wide Assessment Funding

Administrator Pruitt:

I am writing on behalf of the Oregon Health Authority-Public Health Division (OHA-PHD) to express our support for Marion County to obtain EPA Brownfield funding that focuses on the North Santiam Watershed. Since 2010, the OHA-PHD Brownfield Initiative has served as a resource for public health data; in assistance to local health agencies and local jurisdictions; and in support of robust community engagement. With seven years of experience, we have become a leader in the use of the Agency for Toxic Substances and Disease Registry (ATSDR) Action Model process of health monitoring and community and stakeholder engagement.

In the previous year we worked with Marion County Health Department and Marion County Community Development to develop a community health profile for the North Santiam Canyon. The health profile was used in conjunction with assessments of economic and community development needs, as well as watershed analyses to engage a broad network of local jurisdictions and stakeholders in brownfield redevelopment planning.

Through continued collaboration with the Marion County and the North Santiam project partners we are committed to providing health risk assessment and exposure mitigation through our team of toxicologists and health educators. We are also committed to serving in an advisory role to promote evidence-based strategies in redevelopment planning that are the most supportive of health. Specifically we offer brownfield capacity building through technical assistance to promote health based decision making in the site selection and prioritization process; and, by training Marion County on the ATSDR Action Model. This in-kind contribution includes approximately 80 hours of staff time (60 hours in consultative assistance throughout the project period and 20 hours of training) at an estimated amount of \$6,119.13.

Together we can improve the conditions where people live, learn, work, and play and benefit all communities impacted by brownfields. We encourage the EPA to fund the Marion County North Santiam Canyon project. Please contact me with any questions regarding our support.

Respectfully,

Julie Sifuentes
Program Manager, Environmental Public Health
Oregon Health Authority, Public Health Division



100 HIGH STREET S.E., Suite 200 | SALEM, OREGON 97301 | www.mwvcog.org
T: 503.588.6177 | F: 503-588-6094 | E: mwvcog@mwvcog.org
An equal opportunity lender, provider, and employer

November 15, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Marion County EPA Brownfields Community-Wide Assessment grant application

Dear Administrator Pruitt:

The Mid-Willamette Valley Council of Governments (MWVCOG) is pleased to offer support for the Marion County Community-Wide Assessment grant to the Environmental Protection Agency. MWVCOG serves as the Mid-Willamette Economic Development District (EDD) via the Mid-Willamette Valley Community Development Partnership (MWVCDP) Board, which is comprised of both business leaders and local elected official in Marion, Polk and Yamhill Counties.

We strongly support the Marion County application which encourages partnerships with and support of local businesses and residents of the North Santiam Canyon and provides a pathway to removal of economic, programmatic, social, and environmental barriers for many properties within this corridor. By focusing on the health of the regional water supply, the project will have a direct positive benefit to the populations of more than five different communities who pull water from the North Santiam River and represent a population of more than 180,000 persons.

In partnership with this EPA award application, the North Santiam Canyon is included within the Pacific Northwest Manufacturing Partnership (PNMP) designation- a federally designated IMCP Manufacturing Community under the Investing In Manufacturing Communities Partnership (IMCP) Initiative- one of 24 IMCP communities in the nation. A core focus of the PNMP partnership is the strategic pursuit of economic revitalization efforts such as those that would benefit previous mill sites and brownfields, and support declining timber industries and distressed rural communities.

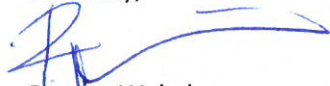
We believe this project is consistent with the goals and objectives of the EPA brownfields community-wide assessment program and the IMCP federal initiative. This project will continue/built upon previous efforts in the region such as:

- Previous and on-going public and private investments within the region, such as the N. Santiam Canyon Economic Opportunity Analysis (2015), Industrial Land Inventory (2016) and 2017 marina improvements at Detroit Lake;

- Expand the ability of North Santiam Canyon communities to recycle vacant and abandoned properties for new, productive reuses like manufacturing- that build upon local economic advantages; and
- Help move these distressed communities toward new or revitalized employment lands and opportunities.

Please consider awarding the Marion County Community-Wide Assessment grant, one of the highest priority population areas for health need, water quality improvements, and economic development efforts established for Marion County and the Willamette Valley.

Sincerely,



Renata Wakeley

MWVCOG Community Development Director



Marion County
OREGON
Health Department

**BOARD OF
COMMISSIONERS**

Sam Brentano
Janet Carlson
Kevin Cameron

HEALTH

ADMINISTRATOR

Cary Moller, MS, LPC

15 November 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 204460

Dear Administrator Pruitt

www.co.marion.or.us/HLT/

Marion County Health Department is pleased to support Marion County's application for an EPA Brownfields Community-Wide Assessment Grant focused on the North Santiam Watershed boundary areas of Marion County.

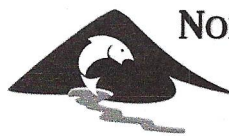
Our mission is to promote wellness and a healthy environment for the people who live, work and play in Marion County. Marion County Health Department has helped to develop a community health profile for the North Santiam Canyon, for use with assessments of economic and community development needs. The requested funding is targeted towards a watershed that provides drinking water for about 70% of the population living in our county. If awarded, it will increase local capacity for assessment, coalition development, and community education, all capabilities that will apply long term to other watersheds and environmental issues.

Upon award of the grant, Marion County Health Department is committed to providing staffing, and looks forward to working with Oregon Health Authority and Marion County Community Development to implement the Agency for Toxic Substances and Disease Registry (ATSDR) Action Model process of health monitoring and community and stakeholder engagement.

Sincerely,

Cary Moller, MS, LPC
Health Administrator

BOW, MPH for Cary Moller
Division Director



NORTH

SANTIAM
watershed council

*Providing opportunities for stakeholders to cooperate in promoting
and sustaining the health of the watershed and its communities.*

November 14, 2017

Administrator Scott Pruitt
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Mr. Pruitt,

On behalf of the North Santiam Watershed Council (NSWC), I am writing this letter in support of the Marion County application for an EPA Brownfields Community-Wide Assessment Grant that focuses on sites in the North Santiam Watershed. The proposed Brownfields Community-Wide Assessment grant is consistent with the NSWC mission of working together with interested parties to facilitate the restoration of habitat important to fish and wildlife and to support the economy and quality of life in its communities.

The North Santiam Watershed (NSW) is a fourth field watershed within the Willamette Basin. It covers approximately 766 square miles (approximately 500,000 acres) on western slopes of the Cascade Mountains to the Willamette Valley floor. Land and water uses are diverse, including timber, agriculture, recreation, rural residential and urban areas, which merge with the following complex mix of features and regulations that intersect in this watershed:

- Drinking water source to Salem, Albany and 9 small communities within the watershed
- Willamette National Forest
- Federally designated Detroit Lake
- Detroit and Big Cliff Dams
- Marion Forks Hatchery
- Stayton Complex Dams and Diversions
- Wild and Scenic waterway on the Little North Santiam
- Essential Salmonid Habitat
- Federally protected old growth forest in Opal Creek
- Forest Practices Act and Northwest Forest Plan
- USACE Willamette Project Biological Opinion
- ESA listed plants- e.g. Bradshaw's Lomatium, Oregon Larkspur, White-topped Aster and Willamette Valley Daisy
- ESA listed animals- e.g. Bald Eagle, Spotted Owl, Chinook salmon and Steelhead
- DEQ's Three Basin Rule
- 303 (d) list of water quality impaired water bodies and TMDL Plan
- Water laws and water rights
- ODFW's Conservation Strategy
- Natural Heritage Resource Area that is also a Bird Conservation Area

As a result, the North Santiam Watershed is a crossroads of a diversity of natural resource related challenges.

The NSWC recognizes unassessed and untreated Brownfield sites pose a threat to the ecological, social and economic assets our communities rely on. The NSWC supports Marion County in its efforts to identify, assess, plan, mitigate and improve the Brownfield sites in the North Santiam.

Please contact me if you have any questions regarding this letter of support.

Thank you for your time.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca McCoun". The signature is written in a cursive style with a large, stylized "R" and "M".

Rebecca McCoun

Council Coordinator

North Santiam Watershed Council

III. B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

Marion County, is the applicant and is a “general purpose unit of local government,” as defined in 40 CFR Part 31, making it eligible to receive USEPA funds for brownfield planning. As a county, no additional proof or documentation is required.

2. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

a. Engaging the Community

i. Community Involvement Plan: The County has extensive experience engaging the target area community in planning and capital improvement projects. Throughout the CWA process, the County will use methods that have proven to be effective and equitable. In particular, the community and other, public- and private-sector, partners will be involved in the BAC (these commitments are stated in Section 3.c). The BAC will give these representatives a seat at the table in formulating the approach of the CWA and key decisions involved in its implementation. The BAC will meet on a regular basis and will be actively engaged in cleanup and redevelopment plans. Broader engagement of the community will include the following:

Public open house events: Once the brownfield inventory is complete, the results will first be reported to the BAC for their analysis and input regarding prioritization and site selection. An open house will be held for the community to review the brownfield inventory and discuss prioritization. Later in the CWA project, the community will be updated as to the progress of Phase I/II ESAs and the progress of the project.

Stakeholder and small group outreach: The County will conduct personal meetings with key stakeholders, businesses, and community groups to engage them in identification of potential brownfield properties, priorities, and redevelopment opportunities. The County has found that meeting one-on-one with stakeholders is the most effective method of engaging members of this community who do not typically attend public meetings.

Web-based communications: The County increasingly uses Web-based tools to engage community members. The County will establish a dedicated Web page for this project that will be updated to track the assessment project. Community members have used these Internet resources as a library for information on previous community planning projects.

As previously stated, the County is committed to an open and equitable process. The County will ensure that all public meetings are accessible and will provide materials upon request.

ii. Communicating Progress: The community involvement plan described above is meant to engage the appropriate stakeholders at the appropriate time. The BAC will be the most engaged group on the project and will have representatives from a wide variety of interest groups, including members of the target community. The BAC members have connections both in the target community and throughout the county and are able to talk with other community members about the project. All BAC meetings will be open to the public. Public meetings will be used when community input is needed during key project milestones, such as site prioritization, site selection, understanding the results of Phase I and Phase II ESAs, and cleanup and redevelopment planning. The BAC will continue to engage the target-area community through the methods currently used, such as notifications in the newspaper, e-mail newsletters, and public meetings.

A Web site dedicated to the project will be created as the information center of the project, where all community members can access BAC meeting agendas, materials, and minutes; find out when the next meeting is taking place; obtain important project updates; access online surveys; and review community meeting materials and summaries. Past outreach efforts have indicated that most attendees are getting their information from local social groups, local newspapers such as The Canyon Weekly and The Stayton Mail as well as the local radio station KYAC, so this should be an effective method of communication. The County will also update *Statesman Journal* reporters and work with the paper to regularly publish about this project and the opportunities for public input and direction.



Marion County

OREGON

FINANCE DEPARTMENT

**BOARD OF
COMMISSIONERS**

Sam Brentano
Janet Carlson
Kevin Cameron

February 8, 2017

**CHIEF ADMINISTRATIVE
OFFICER**

John Lattimer

RE: Tax Exempt Status Marion County, Oregon

**CHIEF FINANCIAL
OFFICER**

Jeff White

Telephone:
(503) 584-4761

Fax:
(503) 373-4379

Marion County is a political subdivision of the State of Oregon. Unlike private organizations, units of government are not required to obtain letters from the Internal Revenue Service to establish their governmental status. Marion County is an Oregon general law county described in ORS 201.240 and a local government as defined in ORS 174.116.

As an established governmental entity, Marion County is exempt from the payment of taxes. It is our opinion that purchases by Marion County employees that are conducting Marion County business are eligible for tax-exempt treatment and should also be eligible to obtain any specific "government" rate.

In addition, under the provisions of the U.S. Code, 26 USC section 170 (c)(1), a charitable contribution is defined as "a contribution or gift to or for the use of a State, a possession of the United States or any political subdivision of any of the foregoing.....if the contribution or gift is made exclusively for public purposes." Marion County is eligible to receive contributions that are deductible as charitable contributions under these conditions and to the extent provided by the law.

If you have any questions, I may be reached at 503.373.4433.

Jeff White
Chief Financial Officer

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

11/16/2017

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name:

Marion County, Oregon

* b. Employer/Taxpayer Identification Number (EIN/TIN):

(b) (4)

* c. Organizational DUNS:

1494546590000

d. Address:

* Street1:

555 Court Street NE

Street2:

Suite 3120

* City:

Salem

County/Parish:

Marion

* State:

OR: Oregon

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

97309-5036

e. Organizational Unit:

Department Name:

Communtiy Services

Division Name:

Economic Development

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

Danielle

Middle Name:

* Last Name:

Gonzalez

Suffix:

Title:

Management Analyst

Organizational Affiliation:

* Telephone Number:

503-589-3235

Fax Number:

503-373-4460

* Email:

dgonzalez@co.marion.or.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

Marion County- USEPA Brownfield Community-Wide Assessment

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="299,940.00"/>
* b. Applicant	<input type="text" value="13,020.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="312,960.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email: * Signature of Authorized Representative: * Date Signed: